

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JEFFREY SIMPSON, individually and derivatively, as :
managing member of JJ ARCH LLC, suing derivatively as :
managing member of ARCH REAL ESTATE :
HOLDINGS LLC, and JJ ARCH LLC : Case No.: 1:25-cv-04004 (LTS)
:
Plaintiff, :
:
- against - :
:
JARED CHASSEN, FIRST REPUBLIC BANK :
Defendants :
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DECLARATION OF JARED CHASSEN IN SUPPORT OF EMERGENCY MOTION

Jared Chassen, duly deposed, declares pursuant to 28 U.S.C. § 1746, as follows:

1. I am a defendant and counterclaim plaintiff in this proceeding. I submit this declaration in support of my emergency motion seeking an order (1) pursuant to 28 U.S.C. § 1447, granting an expedited remand of this action to the New York State Supreme Court, County of New York, Commercial Division (“Commercial Division”) for lack of federal subject matter jurisdiction and failure to comply with the requirements for removal mandated by 28 U.S.C. § 1446; (2) pursuant to 28 U.S.C. § 1447, and the Court’s inherent powers, imposing sanctions, including the imposition of costs and attorney’s fees, against Plaintiff Jeffrey Simpson (“Simpson”) and his counsel Benjamin Rajotte, Esq. (“Rajotte”), incurred as a result of this removal; (3) pursuant to the Court’s inherent powers, enjoining Simpson from any further removal of this proceeding without the prior permission of this Court; (5) holding and adjudging Simpson and Rajotte in civil contempt of the Commercial Division’s March 11, 2025 Order Appointing a Temporary Receiver and the Commercial Division’s May 12, 2025 Order Compelling Jeffrey Simpson to Comply with the Receivership Order and Directing Sherriff to Enforce Receivership

Order (together the “Orders”), ordering Simpson be incarcerated until he complies with the Orders, and holding a hearing to adjudicate Chassen’s damages as against Simpson and Rajotte and (6) granting an injunction pending the hearing of this motion enforcing the Orders and directing the United States Marshall’s service to enforce the Orders; and (7) granting such other and further relief this Court deems just and proper.

2. I have personal knowledge of the facts detailed herein.

3. On May 24, 2025, I drove by Rever Motors located at 1640 Montauk Highway in Watermill New York. I saw Jeffrey Simpson was at the property. I also drove by Simpson’s home in the area and saw numerous vehicles that belonged to Rever Motors parked throughout his driveways.

4. As of May 24, 2025, Simpson has seized control of Rever Motors and has taken vehicles to his home. Given Simpson’s history of looting from the business, given what I witnessed, and given his willingness to defy court orders, there is a grave danger that Simpson will loot whatever remains before this Court can remand this proceeding or enforce the court orders through contempt penalties.

5. I respectfully request that the Court expedite the remand of this proceeding and grant the requested immediate relief enforcing the state court’s orders.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on May 27, 2025.

By:  Jared Chassen

CERTIFICATION PURSUANT TO LOCAL RULE 7.1

I, Allen Schwartz, Esq., certify that the foregoing Declaration contains less than 8750 words, as counted by Microsoft Word's word-processing system, excluding the caption, table of contents, table of authorities and signature block, and that it complies with the applicable word limits.

____/s/_____
Allen Schwartz